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Case No. 4:20-cv-03664-YGR-SVK

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I, Jonathan Tse, declare as follows:

- 1. I am a member of the bar of the State of California and an attorney at Quinn Emanuel Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC ("Google") in this action. I make this declaration of my own personal, firsthand knowledge, and if called and sworn as a witness, I could and would testify competently thereto.
- 2. I am making this declaration pursuant to Civil Local Rule 79-5(e)-(f) as an attorney for Google as the Designating Party, pursuant to Civil Local Rule 79-5(f)(3) in response to Dkts. 608, 609.
- 3. On June 21, 2022, Plaintiffs filed an Administrative Motion to file under seal portions of their Motion for Class Certification ("Plaintiffs' Motion"). On June 29, 2022, the Court granted the Parties' Joint Stipulation and Proposed Order extending time for Google to submit its declaration in support of Plaintiffs' Motion to Seal to July 27, 2022 (Dkt. 619).
- 4. I have reviewed the documents that Plaintiffs seek to file under seal pursuant to Civil Local Rule 79-5, unreducted versions of which have been filed at Docket Entry 608. Based on my review, there is good cause to seal the following information:

Document
Plaintiffs' Notice of Motion and
Motion for Class Certification and
Appointment of Class
Representatives and Class Counsel
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Pages 2:20, 4:5, 4:18, 15:5, 15:7, 15:11-12, 15:27, 16:1, 16:19, 22:7, 22:26-27, 24:15

Google joins Plaintiffs' motion to seal in part with respect to this document.

Basis for Sealing The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, identifiers and logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.

1	[PROPOSED] Order Granting	The information requested to be sealed contains Google's
	Plaintiffs' Motion for Class	highly confidential and proprietary information regarding
2	Certification and Appointment of	highly sensitive features of Google's internal systems and
3	Class Representatives and Class	operations, including various types of Google's internal
3	Counsel	projects, identifiers and logs, and their proprietary
4		functionalities, as well as internal metrics, that Google
_	Pages 5:8, 5:23, 16:8-9, 16:11-12,	maintains as confidential in the ordinary course of its
5	16:21-22, 22:21	business and is not generally known to the public or
6		Google's competitors. Such confidential and proprietary
	Google joins Plaintiffs' motion to seal in part with respect to this	information reveals Google's internal strategies, system
7	document.	designs, and business practices for operating and
	30002220	maintaining many of its important services, and falls
8		within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such
9		confidential and proprietary information could affect
		Google's competitive standing as competitors may alter
10		their systems and practices relating to competing
11		products. It may also place Google at an increased risk of
11		cybersecurity threats, as third parties may seek to use the
12		information to compromise Google's internal practices
13	DI : :: CC > T : 1 DI : C	relating to competing products.
13	Plaintiffs' Trial Plan in Support of Motion for Class Certification	The information requested to be sealed contains Google's
14	Wouldn't Class Certification	highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and
1.5	Pages 1:11, 1:16, 3:27-28, 10:5-6,	operations, including various types of Google's internal
15	10:18-27, 11:18-19, 11:25, 13:2,	projects, identifiers and logs, and their proprietary
16	14:6, 15:8-9, 15:17, 15:24-25, 16:19-21, 18:28, 19:1, 19:14, 20:6-7,	functionalities, as well as internal metrics, that Google
	21:23-24	maintains as confidential in the ordinary course of its
17	~	business and is not generally known to the public or
18	Google joins Plaintiffs' motion to	Google's competitors. Such confidential and proprietary
10	seal in part with respect to this document.	information reveals Google's internal strategies, system
19	document.	designs, and business practices for operating and
20		maintaining many of its important services, and falls
20		within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such
21		confidential and proprietary information could affect
		Google's competitive standing as competitors may alter
22		their systems and practices relating to competing
23		products. It may also place Google at an increased risk of
		cybersecurity threats, as third parties may seek to use the
24		information to compromise Google's internal practices
25		relating to competing products.
23	Exhibit 1 to Mao Declaration	The information requested to be sealed contains Google's
26	(GOOG-BRWN-00406065)	highly confidential and proprietary information regarding
27	Pages -6065-6069	highly sensitive features of Google's internal systems and
27		operations, including various types of Google's internal projects, and their proprietary functionalities, as well as
28	Google joins Plaintiffs' motion to	internal metrics, that Google maintains as confidential in
-	seal in part with respect to this	mioriai monios, mai 300510 mamams as confidential m

1	document.	the ordinary course of its business and is not generally
$_{2}\Vert$		known to the public or Google's competitors. Such
		confidential and proprietary information reveals Google's
3		internal strategies, system designs, and business practices for operating and maintaining many of its important
4		services, and falls within the protected scope of the
7		Protective Order entered in this action. See Dkt. 81 at 2-
5		3. Public disclosure of such confidential and proprietary
6		information could affect Google's competitive standing
		as competitors may alter their systems and practices relating to competing products. It may also place Google
7		at an increased risk of cybersecurity threats, as third
8		parties may seek to use the information to compromise
		Google's internal practices relating to competing
9		products.
10	Exhibit 4 to Mao Declaration (GOOG-BRWN-00475063)	The information requested to be sealed contains Google's
	(3303-DKWIV-007/3003)	highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and
11	Pages -5063-5064, -5066	operations, including various types of Google's internal
12	Google joins Plaintiffs' motion to	projects and identifiers, and their proprietary
13	seal in part with respect to this	functionalities, that Google maintains as confidential in
13	document.	the ordinary course of its business and is not generally
14		known to the public or Google's competitors. Such confidential and proprietary information reveals Google's
15		internal strategies, system designs, and business practices
		for operating and maintaining many of its important
16		services, and falls within the protected scope of the
17		Protective Order entered in this action. See Dkt. 81 at 2-
		3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing
18		as competitors may alter their systems and practices
19		relating to competing products. It may also place Google
20		at an increased risk of cybersecurity threats, as third
20		parties may seek to use the information to compromise Google's internal practices relating to competing
21		Google's internal practices relating to competing products.
22	Exhibit 5 to Mao Declaration	The information requested to be sealed contains Google's
22	(GOOG-CABR-00084985)	highly confidential and proprietary information regarding
23	Page -5043	highly sensitive features of Google's internal systems and
24		operations, including internal presentation that contains
	Google joins Plaintiffs' motion to	links to internal documents and proprietary data, that Google maintains as confidential in the ordinary course of
25	seal in part with respect to this document.	its business and is not generally known to the public or
26		Google's competitors. Such confidential and proprietary
		information reveals Google's internal strategies, system
27		designs, and business practices for operating and maintaining many of its important services, and falls
28		within the protected scope of the Protective Order entered

1		in this action. See Dkt. 81 at 2-3. Public disclosure of such
		confidential and proprietary information could affect
2		Google's competitive standing as competitors may alter
3		their systems and practices relating to competing
		products. It may also place Google at an increased risk of
4		cybersecurity threats, as third parties may seek to use the
5		information to compromise Google's internal practices
	Exhibit 9 to Mao Declaration	relating to competing products.  The information requested to be sealed contains Google's
6	(GOOG-CABR-00093167)	highly confidential and proprietary information regarding
7		highly sensitive features of Google's internal systems and
/	Entirety	operations, including various types of Google's internal
8	Google joins Plaintiffs' motion to	projects, metrics, and research, that Google maintains as
	seal in whole with respect to this	confidential in the ordinary course of its business and is
9	document.	not generally known to the public or Google's
10		competitors. Such confidential and proprietary
		information reveals Google's internal strategies, system designs, and business practices for operating and
11		maintaining many of its important services, and falls
12		within the protected scope of the Protective Order entered
		in this action. See Dkt. 81 at 2-3. Public disclosure of such
13		confidential and proprietary information could affect
14		Google's competitive standing as competitors may alter
		their systems and practices relating to competing
15		products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the
16		information to compromise Google's internal practices
		relating to competing products.
17	Exhibit 10 to Mao Declaration	The information requested to be sealed contains Google's
18	(GOOG-BRWN-00388293)	highly confidential and proprietary information regarding
10	Page -8295	highly sensitive features of Google's internal systems and
19	1 age -6273	operations, including internal communication channels,
20	Google joins Plaintiffs' motion to	that Google maintains as confidential in the ordinary
ا ۷۷	seal in part with respect to this document.	course of its business and is not generally known to the public or Google's competitors. Such confidential and
21	document.	proprietary information reveals Google's internal
22		strategies, system designs, and business practices for
22		operating and maintaining many of its important services,
23		and falls within the protected scope of the Protective
24		Order entered in this action. See Dkt. 81 at 2-3. Public
24		disclosure of such confidential and proprietary
25		information could affect Google's competitive standing as competitors may alter their systems and practices
2		relating to competing products. It may also place Google
26		at an increased risk of cybersecurity threats, as third
27		parties may seek to use the information to compromise
20		Google's internal practices relating to competing
28		products.

1 2 3 4 5 6 7 8	Exhibit 12 to Mao Declaration (GOOG-BRWN-00140297)  Pages -0311-313, -0315-319, -0323, -0325, -0327-329  Google joins Plaintiffs' motion to seal in part with respect to this document.	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter
10		their systems and practices relating to competing
11		products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the
		information to compromise Google's internal practices
12	Exhibit 14 to Mao Declaration	relating to competing products.  The information requested to be sealed contains Google's
13	(GOOG-BRWN-00490767)	highly confidential and proprietary information regarding
14	Entirety	highly sensitive features of Google's internal systems and operations, including internal research and metrics, that
15	Google joins Plaintiffs' motion to seal in whole with respect to this	Google maintains as confidential in the ordinary course of its business and is not generally known to the public or
16	document.	Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system
17		designs, and business practices for operating and maintaining many of its important services, and falls
18		within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such
19		confidential and proprietary information could affect
20		Google's competitive standing as competitors may alter their systems and practices relating to competing
21		products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the
22		information to compromise Google's internal practices
23	Exhibit 18 to Mao Declaration	relating to competing products.  The information requested to be sealed contains Google's
24	(GOOG-CABR-05836882)	highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and
25	Entirety	operations, including various types of Google's internal
26	Google joins Plaintiffs' motion to seal in whole with respect to this	projects and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its
27	document.	business and is not generally known to the public or
28		Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system

1		designs, and business practices for operating and
		maintaining many of its important services, and falls
2		within the protected scope of the Protective Order entered
3		in this action. See Dkt. 81 at 2-3. Public disclosure of such
		confidential and proprietary information could affect
4		Google's competitive standing as competitors may alter
_		their systems and practices relating to competing
5		products. It may also place Google at an increased risk of
6		cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices
		relating to competing products.
7	Exhibit 21 to Mao Declaration	The information requested to be sealed contains Google's
8	(GOOG-CABR-04154452)	highly confidential and proprietary information regarding
8		highly sensitive features of Google's internal systems and
9	Entirety	operations, including various types of Google's internal
10	Google joins Plaintiffs' motion to	projects, identifiers, and their proprietary functionalities,
10	seal in whole with respect to this	as well as internal research, that Google maintains as
11	document.	confidential in the ordinary course of its business and is
		not generally known to the public or Google's
12		competitors. Such confidential and proprietary
13		information reveals Google's internal strategies, system
13		designs, and business practices for operating and
14		maintaining many of its important services, and falls
		within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such
15		confidential and proprietary information could affect
16		Google's competitive standing as competitors may alter
		their systems and practices relating to competing
17		products. It may also place Google at an increased risk of
18		cybersecurity threats, as third parties may seek to use the
10		information to compromise Google's internal practices
19		relating to competing products.
	Exhibit 24 to Mao Declaration	The information requested to be sealed contains Google's
20	(GOOG-CABR-05766200.R)	highly confidential and proprietary information regarding
21	Pages -6201.R, -6204.R	highly sensitive features of Google's internal systems and
		operations, including various types of Google's internal projects, identifiers, and metrics, that Google maintains as
22	Google joins Plaintiffs' motion to	confidential in the ordinary course of its business and is
23	seal in part with respect to this document.	not generally known to the public or Google's
23		competitors. Such confidential and proprietary
24		information reveals Google's internal strategies, system
25		designs, and business practices for operating and
25		maintaining many of its important services, and falls
26		within the protected scope of the Protective Order entered
		in this action. See Dkt. 81 at 2-3. Public disclosure of such
27		confidential and proprietary information could affect
28		Google's competitive standing as competitors may alter their systems and practices relating to competing
-0		men systems and practices relating to competing

1		products. It may also place Google at an increased risk of
2		cybersecurity threats, as third parties may seek to use the
_		information to compromise Google's internal practices
3	Exhibit 25 to Mao Declaration	relating to competing products.  The information requested to be sealed contains Google's
4	(GOOG-CABR-05150754)	highly confidential and proprietary information regarding
7		highly sensitive features of Google's internal systems and
5	Entirety	operations, including various types of Google's internal
6	Google joins Plaintiffs' motion to	projects and their proprietary functionalities, that Google
	seal in whole with respect to this	maintains as confidential in the ordinary course of its business and is not generally known to the public or
7	document.	Google's competitors. Such confidential and proprietary
8		information reveals Google's internal strategies, system
		designs, and business practices for operating and
9		maintaining many of its important services, and falls
10		within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such
11		confidential and proprietary information could affect
11		Google's competitive standing as competitors may alter
12		their systems and practices relating to competing
13		products. It may also place Google at an increased risk of
13		cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices
14		relating to competing products.
15	Exhibit 26 to Mao Declaration	The information requested to be sealed contains Google's
	(GOOG-BRWN-00166653)	highly confidential and proprietary information regarding
16	Entirety	highly sensitive features of Google's internal systems and
17		operations, including various types of Google's internal projects and their proprietary functionalities, as well as
10	Google joins Plaintiffs' motion to seal in whole with respect to this	internal research, that Google maintains as confidential in
18	document.	the ordinary course of its business and is not generally
19		known to the public or Google's competitors. Such
20		confidential and proprietary information reveals Google's
ا ۵۷		internal strategies, system designs, and business practices for operating and maintaining many of its important
21		services, and falls within the protected scope of the
22		Protective Order entered in this action. See Dkt. 81 at 2-
		3. Public disclosure of such confidential and proprietary
23		information could affect Google's competitive standing as competitors may alter their systems and practices
24		relating to competing products. It may also place Google
		at an increased risk of cybersecurity threats, as third
25		parties may seek to use the information to compromise
26		Google's internal practices relating to competing
27	Exhibit 27 to Mao Declaration	products.  The information requested to be sealed contains Google's
<sup>2</sup>	(GOOG-CABR-05145513)	highly confidential and proprietary information regarding
28		highly sensitive features of Google's internal systems and
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1	Entirety	operations, including various types of Google's internal
2	Google joins Plaintiffs' motion to	projects and their proprietary functionalities, as well as internal research, that Google maintains as confidential in
3	seal in whole with respect to this document.	the ordinary course of its business and is not generally
		known to the public or Google's competitors. Such
4		confidential and proprietary information reveals Google's internal strategies, system designs, and business practices
5		for operating and maintaining many of its important
6		services, and falls within the protected scope of the
		Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary
7		information could affect Google's competitive standing
8		as competitors may alter their systems and practices
9		relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third
		parties may seek to use the information to compromise
10		Google's internal practices relating to competing
11	Exhibit 29 to Mao Declaration	products.  The information requested to be sealed contains Google's
12	(GOOG-BRWN-00388293)	highly confidential and proprietary information regarding
13	   Page -8295	highly sensitive features of Google's internal systems and
		operations, including internal communication channels, that Google maintains as confidential in the ordinary
14	Google joins Plaintiffs' motion to seal in part with respect to this	course of its business and is not generally known to the
15	document.	public or Google's competitors. Such confidential and
16		proprietary information reveals Google's internal strategies, system designs, and business practices for
		operating and maintaining many of its important services,
17		and falls within the protected scope of the Protective
18		Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary
19		information could affect Google's competitive standing
		as competitors may alter their systems and practices
20		relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third
21		parties may seek to use the information to compromise
22		Google's internal practices relating to competing
	Exhibit 30 to Mao Declaration	products.  The information requested to be sealed contains Google's
23	GOOG-CABR-00501220	highly confidential and proprietary information regarding
24	Pages -1221, -1222, -1224, -1225	highly sensitive features of Google's internal systems and
25		operations, including various types of Google's internal projects and their proprietary functionalities, as well as
26	Google joins Plaintiffs' motion to seal in part with respect to this	internal research, that Google maintains as confidential in
	document.	the ordinary course of its business and is not generally
27		known to the public or Google's competitors. Such
28		confidential and proprietary information reveals Google's internal strategies, system designs, and business practices

1		for operating and maintaining many of its important
2		services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-
3		3. Public disclosure of such confidential and proprietary
		information could affect Google's competitive standing
4		as competitors may alter their systems and practices relating to competing products. It may also place Google
5		at an increased risk of cybersecurity threats, as third
6		parties may seek to use the information to compromise
		Google's internal practices relating to competing products.
7	Exhibit 31 to Mao Declaration	The information requested to be sealed contains Google's
8	(GOOG-BRWN-00428101)	highly confidential and proprietary information regarding
9	Entirety	highly sensitive features of Google's internal systems and
	Google joins Plaintiffs' motion to	operations, including various types of Google's internal projects, identifiers, and their proprietary functionalities,
10	Google joins Plaintiffs' motion to seal in whole with respect to this	as well as internal metrics, that Google maintains as
11	document.	confidential in the ordinary course of its business and is not generally known to the public or Google's
12		competitors. Such confidential and proprietary
		information reveals Google's internal strategies, system
13		designs, and business practices for operating and maintaining many of its important services, and falls
14		within the protected scope of the Protective Order entered
15		in this action. See Dkt. 81 at 2-3. Public disclosure of such
16		confidential and proprietary information could affect
16		Google's competitive standing as competitors may alter their systems and practices relating to competing
17		products. It may also place Google at an increased risk of
18		cybersecurity threats, as third parties may seek to use the
10		information to compromise Google's internal practices relating to competing products.
19	Exhibit 32 to Mao Declaration	The information requested to be sealed contains Google's
20	(GOOG-CABR-03849022)	highly confidential and proprietary information regarding
21	Entirety	highly sensitive features of Google's internal systems and operations, including various types of Google's internal
22	Google joins Plaintiffs' motion to	projects, identifiers, data signals, and logs, and their
	seal in whole with respect to this	proprietary functionalities, as well as internal metrics, that
23	document.	Google maintains as confidential in the ordinary course of its business and is not generally known to the public or
24		Google's competitors. Such confidential and proprietary
25		information reveals Google's internal strategies, system
		designs, and business practices for operating and maintaining many of its important services, and falls
26		within the protected scope of the Protective Order entered
27		in this action. See Dkt. 81 at 2-3. Public disclosure of such
28		confidential and proprietary information could affect Google's competitive standing as competitors may alter
	<u> </u>	6

1 2 3 4 5 6 7 8 9 10 11 12 13 14	Exhibit 33 to Mao Declaration (GOOG-BRWN-00686207) Entirety Google joins Plaintiffs' motion to seal in whole with respect to this document.	their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.  The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal research and metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the
5 6 7 8 9 10 11 12	(GOOG-BRWN-00686207)  Entirety  Google joins Plaintiffs' motion to seal in whole with respect to this	highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal research and metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of
15		relating to competing products.
16	Exhibit 36 to Mao Declaration (GOOG-BRWN-00529122)  Pages -9122, -9123	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and
17		operations, including various types of Google's internal projects, and their proprietary functionalities, as well as
18 19	Google joins Plaintiffs' motion to seal in part with respect to this document.	internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally
20		known to the public or Google's competitors. Such confidential and proprietary information reveals Google's
21		internal strategies, system designs, and business practices for operating and maintaining many of its important
22		services, and falls within the protected scope of the
23		Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary
24		information could affect Google's competitive standing as competitors may alter their systems and practices
25		relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third
26		parties may seek to use the information to compromise Google's internal practices relating to competing
27		products.
28	Exhibit 37 to Mao Declaration GOOG-BRWN 00176477	The information requested to be sealed contains Google's highly confidential and proprietary information regarding
11		

1		highly sensitive features of Google's internal systems and
2	Pages -6478, -6479, 6480	operations, including various types of Google's internal
	Google joins Plaintiffs' motion to	projects, identifiers, metrics, that Google maintains as confidential in the ordinary course of its business and is
3	seal in part with respect to this	not generally known to the public or Google's
4	document.	competitors. Such confidential and proprietary
5		information reveals Google's internal strategies, system
3		designs, and business practices for operating and maintaining many of its important services, and falls
6		within the protected scope of the Protective Order entered
7		in this action. See Dkt. 81 at 2-3. Public disclosure of such
0		confidential and proprietary information could affect Google's competitive standing as competitors may alter
8		their systems and practices relating to competing
9		products. It may also place Google at an increased risk of
10		cybersecurity threats, as third parties may seek to use the
		information to compromise Google's internal practices relating to competing products.
11	Exhibit 38 to Mao Declaration	The information requested to be sealed contains Google's
12	(GOOG-CABR-00411915)	highly confidential and proprietary information regarding
13	Entirety	highly sensitive features of Google's internal systems and operations, including various types of Google's internal
	Casalaising Plaintiffs' motion to	projects, identifiers, and their proprietary functionalities,
14	Google joins Plaintiffs' motion to seal in whole with respect to this	that Google maintains as confidential in the ordinary
15	document.	course of its business and is not generally known to the
16		public or Google's competitors. Such confidential and proprietary information reveals Google's internal
		strategies, system designs, and business practices for
17		operating and maintaining many of its important services,
18		and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public
19		disclosure of such confidential and proprietary
		information could affect Google's competitive standing
20		as competitors may alter their systems and practices
21		relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third
22		parties may seek to use the information to compromise
		Google's internal practices relating to competing
23	Exhibit 39 to Mao Declaration	products.  The information requested to be sealed contains Google's
24	(GOOG-BRWN-00067645)	highly confidential and proprietary information regarding
25	Entirety	highly sensitive features of Google's internal systems and
		operations, including various types of Google's internal
26	Google joins Plaintiffs' motion to seal in whole with respect to this	projects and research, that Google maintains as confidential in the ordinary course of its business and is
27	document.	not generally known to the public or Google's
28		competitors. Such confidential and proprietary information reveals Google's internal strategies, system

1		designs, and business practices for operating and maintaining many of its important services, and falls
2		within the protected scope of the Protective Order entered
3		in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect
4		Google's competitive standing as competitors may alter their systems and practices relating to competing
5		products. It may also place Google at an increased risk of
6		cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices
7		relating to competing products.
8	Exhibit 44 to Mao Declaration GOOG-CABR-05371009	The information requested to be sealed contains Google's highly confidential and proprietary information regarding
9	Pages -1009, -1011, PDF page 5	highly sensitive features of Google's internal systems and operations, including various types of Google's internal
10		identifiers, that Google maintains as confidential in the ordinary course of its business and is not generally known
11	Google joins Plaintiffs' motion to seal in part with respect to this document.	to the public or Google's competitors. Such confidential
12	document.	and proprietary information reveals Google's internal strategies, system designs, and business practices for
13		operating and maintaining many of its important services, and falls within the protected scope of the Protective
14		Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary
15		information could affect Google's competitive standing
16		as competitors may alter their systems and practices relating to competing products. It may also place Google
17		at an increased risk of cybersecurity threats, as third
18		parties may seek to use the information to compromise Google's internal practices relating to competing
	E L'I'. ACC. M. D. L. C.	products.
19	Exhibit 46 to Mao Declaration GOOG-BRWN-00047390	The information requested to be sealed contains Google's highly confidential and proprietary information regarding
20	Pages -7391, -7395, -7396, -7397, -	highly sensitive features of Google's internal systems and
21	7398	operations, including various types of Google's internal projects, and their proprietary functionalities, that Google
22	Google joins Plaintiffs' motion to	maintains as confidential in the ordinary course of its business and is not generally known to the public or
23	seal in part with respect to this document.	Google's competitors. Such confidential and proprietary
24		information reveals Google's internal strategies, system designs, and business practices for operating and
25		maintaining many of its important services, and falls
26		within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such
27		confidential and proprietary information could affect Google's competitive standing as competitors may alter
28		their systems and practices relating to competing
20	<u> </u>	products. It may also place Google at an increased risk of

1		cybersecurity threats, as third parties may seek to use the
2		information to compromise Google's internal practices relating to competing products.
3	Exhibit 51 to Mao Declaration GOOG-BRWN-00182492	The information requested to be sealed contains Google's highly confidential and proprietary information regarding
4	Page -2492	highly sensitive features of Google's internal systems and operations, including Google's internal identifiers, that
5	Google joins Plaintiffs' motion to	Google maintains as confidential in the ordinary course of its business and is not generally known to the public or
6	seal in part with respect to this document.	Google's competitors. Such confidential and proprietary
7		information reveals Google's internal strategies, system designs, and business practices for operating and
8		maintaining many of its important services, and falls within the protected scope of the Protective Order entered
9		in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect
10		Google's competitive standing as competitors may alter their systems and practices relating to competing
		products. It may also place Google at an increased risk of
12		cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices
14	Exhibit 53 to Mao Declaration	relating to competing products.  The information requested to be sealed contains Google's
15	Deposition of Rory McClelland	highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and
16	Pages 124:5, 132:15, 133:17, 133:20-25	operations, including various types of Google's internal projects, identifiers, and their proprietary functionalities,
17	Google joins Plaintiffs' motion to seal in part with respect to this	that Google maintains as confidential in the ordinary course of its business and is not generally known to the
18	document.	public or Google's competitors. Such confidential and
19		proprietary information reveals Google's internal strategies, system designs, and business practices for
20		operating and maintaining many of its important services, and falls within the protected scope of the Protective
21		Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary
22		information could affect Google's competitive standing as competitors may alter their systems and practices
23		relating to competing products. It may also place Google
24		at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise
25		Google's internal practices relating to competing products.
26	Exhibit 54 to Mao Declaration GOOG-BRWN-00409986	The information requested to be sealed contains Google's highly confidential and proprietary information regarding
27	Pages -9986-987	highly sensitive features of Google's internal systems and operations, including various types of Google's internal
28	Google joins Plaintiffs' motion to	projects, identifiers, and their proprietary functionalities,

1	seal in part with respect to this document.	as well as internal metrics, that Google maintains as
2	document.	confidential in the ordinary course of its business and is not generally known to the public or Google's
3		competitors. Such confidential and proprietary
4		information reveals Google's internal strategies, system designs, and business practices for operating and
5		maintaining many of its important services, and falls within the protected scope of the Protective Order entered
6		in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect
7		Google's competitive standing as competitors may alter
8		their systems and practices relating to competing products. It may also place Google at an increased risk of
9		cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices
10		relating to competing products.
11	Exhibit 55 to Mao Declaration GOOG-BRWN-00477510	The information requested to be sealed contains Google's highly confidential and proprietary information regarding
	Entirety	highly sensitive features of Google's internal systems and
12	Google joins Plaintiffs' motion to	operations, including various types of Google's internal projects, identifiers, and their proprietary functionalities,
13	seal in whole with respect to this	as well as internal metrics and research, that Google maintains as confidential in the ordinary course of its
14	document.	business and is not generally known to the public or
15		Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system
16		designs, and business practices for operating and maintaining many of its important services, and falls
17 18		within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such
19		confidential and proprietary information could affect Google's competitive standing as competitors may alter
		their systems and practices relating to competing
20		products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the
21		information to compromise Google's internal practices relating to competing products.
22	Exhibit 56 to Mao Declaration	The information requested to be sealed contains Google's
23	GOOG-CABR-05126022	highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and
24	Page -6023	operations, including various types of Google's internal
25	Google joins Plaintiffs' motion to seal in part with respect to this	projects and identifiers, that Google maintains as confidential in the ordinary course of its business and is
26	document.	not generally known to the public or Google's competitors. Such confidential and proprietary
27		information reveals Google's internal strategies, system
28		designs, and business practices for operating and maintaining many of its important services, and falls

1		within the protected scope of the Protective Order entered
2		in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect
3		Google's competitive standing as competitors may alter
4		their systems and practices relating to competing products. It may also place Google at an increased risk of
4		cybersecurity threats, as third parties may seek to use the
5		information to compromise Google's internal practices
6	Exhibit 57 to Mao Declaration	relating to competing products.  The information requested to be sealed contains Google's
7	GOOG-CABR-05269357.RR	highly confidential and proprietary information regarding
8	Entirety	highly sensitive features of Google's internal systems and operations, including various types of Google's internal
9	Google joins Plaintiffs' motion to	projects, identifiers, data signals, and logs, and their
	seal in whole with respect to this document.	proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of
10		its business and is not generally known to the public or Google's competitors. Such confidential and proprietary
11		information reveals Google's internal strategies, system
12		designs, and business practices for operating and maintaining many of its important services, and falls
13		within the protected scope of the Protective Order entered
14		in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect
15		Google's competitive standing as competitors may alter
16		their systems and practices relating to competing products. It may also place Google at an increased risk of
17		cybersecurity threats, as third parties may seek to use the
		information to compromise Google's internal practices relating to competing products.
18	Exhibit 58 to Mao Declaration	The information requested to be sealed contains Google's
19	GOOG-BRWN-00418249	highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and
20	Pages -8249, -8250, PDF p. 4-5	operations, including various types of Google's internal
21	Google joins Plaintiffs' motion to seal in part with respect to this	projects and identifiers, that Google maintains as confidential in the ordinary course of its business and is
22	document.	not generally known to the public or Google's competitors. Such confidential and proprietary
23		information reveals Google's internal strategies, system
24		designs, and business practices for operating and maintaining many of its important services, and falls
25		within the protected scope of the Protective Order entered
26		in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect
		Google's competitive standing as competitors may alter their systems and practices relating to competing
27 28		products. It may also place Google at an increased risk of
۷٥	<u> </u>	cybersecurity threats, as third parties may seek to use the

1		information to compromise Google's internal practices
2	Exhibit 59 to Mao Declaration	relating to competing products.
3	GOOG-BRWN-00167337	The information requested to be sealed contains Google's highly confidential and proprietary information regarding
4	Pages -7337, -7339	highly sensitive features of Google's internal systems and operations, including various types of Google's internal
5	PDF p. 6-7	projects and identifiers, that Google maintains as confidential in the ordinary course of its business and is
6	Google joins Plaintiffs' motion to seal in part with respect to this	not generally known to the public or Google's
7	document.	competitors. Such confidential and proprietary information reveals Google's internal strategies, system
8		designs, and business practices for operating and maintaining many of its important services, and falls
9		within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such
10		confidential and proprietary information could affect
11		Google's competitive standing as competitors may alter their systems and practices relating to competing
		products. It may also place Google at an increased risk of
12		cybersecurity threats, as third parties may seek to use the
13		information to compromise Google's internal practices relating to competing products.
14	Exhibit 60 to Mao Declaration GOOG-CABR-05603788	The information requested to be sealed contains Google's highly confidential and proprietary information regarding
15	Page -3788, PDF p. 5	highly sensitive features of Google's internal systems and operations, including various types of Google's internal
16	Google joins Plaintiffs' motion to	projects and identifiers, that Google maintains as confidential in the ordinary course of its business and is
17	seal in part with respect to this document.	not generally known to the public or Google's
18		competitors. Such confidential and proprietary information reveals Google's internal strategies, system
19		designs, and business practices for operating and maintaining many of its important services, and falls
20		within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such
21		confidential and proprietary information could affect
22		Google's competitive standing as competitors may alter their systems and practices relating to competing
23		products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the
24		information to compromise Google's internal practices relating to competing products.
25	Exhibit 61 to Mao Declaration	The information requested to be sealed contains Google's
26	GOOG-CABR-05536108	highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and
27	Page -6109	operations, including various types of Google's internal
28	Google joins Plaintiffs' motion to seal in part with respect to this	projects and identifiers, that Google maintains as confidential in the ordinary course of its business and is

document.    The protection of the public or Google's competitors. Such confidential and proprictary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal systems and operations, including various types of Google's internal systems and operations, including various types of Google's internal systems and operations, including various types of Google's internal systems and operations, including various types of Google's internal systems and operations, including various types of Google's internal systems and operations, including various types of Google's internal systems and operations, including various types of Google's internal systems and operations, including various types of Google's internal systems and projects and identifiers, that Google maintains as confidential and proprietary information could affect Google's competitors. Such confidential and proprietary information could affect Google's competitive standing as competitions may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal strategies, system and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information reveals Google of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietar			
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1		confidential and proprietary information could affect
		Google's competitive standing as competitors may alter
2		their systems and practices relating to competing
3		products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the
4		information to compromise Google's internal practices
5	Exhibit 66 to Mao Declaration	relating to competing products.
6	GOOG-BRWN-00390418	The information requested to be sealed contains Google's highly confidential and proprietary information regarding
7	Pages -0418, -0419	highly sensitive features of Google's internal systems and operations, including various types of Google's internal
′	Google joins Plaintiffs' motion to	projects, identifiers, and internal communication
8	seal in part with respect to this document.	channels, that Google maintains as confidential in the ordinary course of its business and is not generally known
9	document.	to the public or Google's competitors. Such confidential
10		and proprietary information reveals Google's internal strategies, system designs, and business practices for
11		operating and maintaining many of its important services, and falls within the protected scope of the Protective
12		Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary
13		information could affect Google's competitive standing
14		as competitors may alter their systems and practices relating to competing products. It may also place Google
15		at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise
16		Google's internal practices relating to competing
17	Edition No. D. L.	products.
18	Exhibit 67 to Mao Declaration GOOG-BRWN-00410884	The information requested to be sealed contains Google's highly confidential and proprietary information regarding
	Pages -0884, -0885	highly sensitive features of Google's internal systems and operations, including various types of Google's internal
19	PDF p. 4-6	projects and identifiers, that Google maintains as
20	Google joins Plaintiffs' motion to seal in part with respect to this	confidential in the ordinary course of its business and is not generally known to the public or Google's
21	document.	competitors. Such confidential and proprietary
22		information reveals Google's internal strategies, system designs, and business practices for operating and
23		maintaining many of its important services, and falls within the protected scope of the Protective Order entered
24		in this action. See Dkt. 81 at 2-3. Public disclosure of such
25		confidential and proprietary information could affect Google's competitive standing as competitors may alter
26		their systems and practices relating to competing products. It may also place Google at an increased risk of
27		cybersecurity threats, as third parties may seek to use the
28		information to compromise Google's internal practices relating to competing products.
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1 2	Exhibit 71 to Mao Declaration GOOG-CABR-04261880	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly consistive features of Google's internal systems and
3	Pages -1880, PDF Page 3	highly sensitive features of Google's internal systems and operations, including various types of Google's internal
4	Google joins Plaintiffs' motion to seal in part with respect to this	projects and identifiers, that Google maintains as confidential in the ordinary course of its business and is
5	document.	not generally known to the public or Google's
		competitors. Such confidential and proprietary information reveals Google's internal strategies, system
6		designs, and business practices for operating and maintaining many of its important services, and falls
7		within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such
8		confidential and proprietary information could affect
9		Google's competitive standing as competitors may alter their systems and practices relating to competing
10		products. It may also place Google at an increased risk of
11		cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices
12	Exhibit 72 to Mao Declaration	relating to competing products.  The information requested to be sealed contains Google's
13	GOOG-CABR-03923580	highly confidential and proprietary information regarding
14	Pages -3580-584, PDF page 6	highly sensitive features of Google's internal systems and operations, including various types of Google's internal
15	Google joins Plaintiffs' motion to	projects and identifiers, that Google maintains as confidential in the ordinary course of its business and is
16	seal in part with respect to this document.	not generally known to the public or Google's
17		competitors. Such confidential and proprietary information reveals Google's internal strategies, system
18		designs, and business practices for operating and maintaining many of its important services, and falls
19		within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such
20		confidential and proprietary information could affect
21		Google's competitive standing as competitors may alter their systems and practices relating to competing
22		products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the
23		information to compromise Google's internal practices
24	Exhibit 73 to Mao Declaration	relating to competing products.  The information requested to be sealed contains Google's
25	GOOG-CABR-03827263	highly confidential and proprietary information regarding
26	Pages -7263	highly sensitive features of Google's internal systems and operations, including various types of Google's internal
27	Google joins Plaintiffs' motion to	projects and identifiers, that Google maintains as confidential in the ordinary course of its business and is
28	seal in part with respect to this document.	not generally known to the public or Google's
40		competitors. Such confidential and proprietary

1		information reveals Google's internal strategies, system
		designs, and business practices for operating and
2		maintaining many of its important services, and falls
3		within the protected scope of the Protective Order entered
		in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect
4		Google's competitive standing as competitors may alter
5		their systems and practices relating to competing
		products. It may also place Google at an increased risk of
6		cybersecurity threats, as third parties may seek to use the
7		information to compromise Google's internal practices
	Edition No. D. L.	relating to competing products.
8	Exhibit 74 to Mao Declaration GOOG-BRWN-00047399	The information requested to be sealed contains Google's
9	BOOG BICKIT 0004/3//	highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and
	Entirety	operations, including various types of Google's internal
10	Google joins Plaintiffs' motion to	projects, identifiers, and research, that Google maintains
11	seal in whole with respect to this	as confidential in the ordinary course of its business and
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12		competitors. Such confidential and proprietary information reveals Google's internal strategies, system
13		designs, and business practices for operating and
		maintaining many of its important services, and falls
14		within the protected scope of the Protective Order entered
15		in this action. See Dkt. 81 at 2-3. Public disclosure of such
		confidential and proprietary information could affect
16		Google's competitive standing as competitors may alter
17		their systems and practices relating to competing products. It may also place Google at an increased risk of
10		cybersecurity threats, as third parties may seek to use the
18		information to compromise Google's internal practices
19		relating to competing products.
	Exhibit 75 to Mao Declaration	The information requested to be sealed contains Google's
20	GOOG-CABR-04991831	highly confidential and proprietary information regarding
21	Page -831, PDF Page 4	highly sensitive features of Google's internal systems and operations, including various types of Google's internal
22	Google joing Plaintiffs' motion to	projects and identifiers, that Google maintains as
22	Google joins Plaintiffs' motion to seal in part with respect to this	confidential in the ordinary course of its business and is
23	document.	not generally known to the public or Google's
24		competitors. Such confidential and proprietary
24		information reveals Google's internal strategies, system
25		designs, and business practices for operating and maintaining many of its important services, and falls
2		within the protected scope of the Protective Order entered
26		in this action. See Dkt. 81 at 2-3. Public disclosure of such
27		confidential and proprietary information could affect
20		Google's competitive standing as competitors may alter
28		their systems and practices relating to competing

1		products. It may also place Google at an increased risk of
2		cybersecurity threats, as third parties may seek to use the
_		information to compromise Google's internal practices
3	Exhibit 76 to Mao Declaration	relating to competing products.  The information requested to be sealed contains Google's
4	GOOG-BRWN-00047341	highly confidential and proprietary information regarding
	D 244	highly sensitive features of Google's internal systems and
5	Page -344	operations, including various types of Google's internal
6	Google joins Plaintiffs' motion to	projects, and their proprietary functionalities, that Google
	seal in part with respect to this document.	maintains as confidential in the ordinary course of its business and is not generally known to the public or
7	document.	Google's competitors. Such confidential and proprietary
8		information reveals Google's internal strategies, system
9		designs, and business practices for operating and maintaining many of its important services, and falls
10		within the protected scope of the Protective Order entered
10		in this action. See Dkt. 81 at 2-3. Public disclosure of such
11		confidential and proprietary information could affect Google's competitive standing as competitors may alter
12		their systems and practices relating to competing
		products. It may also place Google at an increased risk of
13		cybersecurity threats, as third parties may seek to use the
14		information to compromise Google's internal practices relating to competing products.
15	Exhibit 77 to Mao Declaration	The information requested to be sealed contains Google's
	GOOG-CABR-05269678	highly confidential and proprietary information regarding
16	Page -680	highly sensitive features of Google's internal systems and operations, including various types of Google's internal
17	Google joins Plaintiffs' motion to	identifiers, that Google maintains as confidential in the
18	seal in part with respect to this	ordinary course of its business and is not generally known
	document.	to the public or Google's competitors. Such confidential
19		and proprietary information reveals Google's internal strategies, system designs, and business practices for
20		operating and maintaining many of its important services,
21		and falls within the protected scope of the Protective
		Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary
22		information could affect Google's competitive standing
23		as competitors may alter their systems and practices
24		relating to competing products. It may also place Google
24		at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise
25		Google's internal practices relating to competing
26	D. 111. 70	products.
	Exhibit 78 to Mao Declaration GOOG-CABR-04798344	The information requested to be sealed contains Google's
27		highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and
28	Entirety	operations, including various types of Google's internal

1	Google joins Plaintiffs' motion to seal in whole with respect to this	projects, identifiers, metrics, that Google maintains as confidential in the ordinary course of its business and is
2	document.	not generally known to the public or Google's
3		competitors. Such confidential and proprietary information reveals Google's internal strategies, system
4		designs, and business practices for operating and maintaining many of its important services, and falls
5		within the protected scope of the Protective Order entered
6		in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect
7		Google's competitive standing as competitors may alter their systems and practices relating to competing
8		products. It may also place Google at an increased risk of
9		cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices
10	Exhibit 80 to Mao Declaration	relating to competing products.  The information requested to be sealed contains Google's
11	GOOG-BRWN-00042388	highly confidential and proprietary information regarding
12	Pages -404, -408, -410	highly sensitive features of Google's internal systems and operations, including various types of Google's internal
13	Google joins Plaintiffs' motion to seal in part with respect to this	projects, identifiers, and their proprietary functionalities, as well as internal research and metrics, that Google
14	document.	maintains as confidential in the ordinary course of its business and is not generally known to the public or
15		Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system
16		designs, and business practices for operating and maintaining many of its important services, and falls
17		within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such
18 19		confidential and proprietary information could affect Google's competitive standing as competitors may alter
20		their systems and practices relating to competing products. It may also place Google at an increased risk of
21		cybersecurity threats, as third parties may seek to use the
		information to compromise Google's internal practices relating to competing products.
22	Exhibit 81 to Mao Declaration GOOG-CABR-04431207	The information requested to be sealed contains Google's
23		highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and
24	Entirety	operations, including various types of Google's internal
25	Google joins Plaintiffs' motion to seal in whole with respect to this	projects, identifiers, and their proprietary functionalities, as well as internal research and metrics, that Google
26	document.	maintains as confidential in the ordinary course of its business and is not generally known to the public or
27		Google's competitors. Such confidential and proprietary
28		information reveals Google's internal strategies, system designs, and business practices for operating and

within the protected scope of the Protective Order enter in this action. See Dkt. 81 at 2-3. Public disclosure of su confidential and proprietary information could aff Google's competitive standing as competitors may al their systems and practices relating to competit products. It may also place Google at an increased risk cybersecurity threats, as third parties may seek to use to information to compromise Google's internal practic relating to competing products.  Entirety Google joins Plaintiffs' motion to seal in whole with respect to this document.  The information requested to be scaled contains Google inighly sensitive features of Google's internal systems a operations, including various types of Google's internal systems a operations, including various types of Google's internal systems and proprietary functionalities, as well as internal metrics, it Google maintains as confidential and proprietary functionalities, as well as internal metrics, it Google is minernal systems a operations. See Dkt. 81 at 2-3. Public disclosure of su confidential and proprietary information could aff Google's competitors. Such confidential and proprietary information could aff Google's competitive standing as competitors may al their systems and practices relating to competitive standing as competitors may al their systems and practices relating to competitive standing as competitors may al their systems and practices relating to competiting products. It may also place Google at an increased risk cybersecurity threats, as third parties may seek to use tinformation to compromise Google's internal systems a operations, including various types of Google's internal systems a operations, including various types of Google's internal systems a operations, including various types of Google's internal systems a operations, including various types of Google's internal systems a operations, including various types of Google's internal systems a operations, including various types of Google's internal systems a operations, including vari			
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27 confidential and proprietary information could affect	26		within the protected scope of the Protective Order entered
	27		
	41		Google's competitive standing as competitors may alter
	28		their systems and practices relating to competing

1		products. It may also place Google at an increased risk of
2		cybersecurity threats, as third parties may seek to use the
4		information to compromise Google's internal practices
3		relating to competing products.
	Exhibit 86 to Mao Declaration	The information requested to be sealed contains Google's
4	Pages 2:14, 2:20, 2:24-26, 2:28, 3:1,	highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and
5	3:3-10, 3:12-23, 3:27-28, 4:1-4, 6:1,	operations, including various types of Google's internal
	6:3-4, 6:6, 6:8-11, 6:13-27, 7:1, 7:3-	projects, identifiers, data signals, and logs, and their
6	9, 7:11-26, 8:1-13, 8:15-18	proprietary functionalities, that Google maintains as
7	Supplemental Declaration of Martin	confidential in the ordinary course of its business and is
´	Sramek in Response to May 20,	not generally known to the public or Google's
8	2022 Order	competitors. Such confidential and proprietary
9	Google joins Plaintiffs' motion to	information reveals Google's internal strategies, system
9	seal in part with respect to this	designs, and business practices for operating and
10	document.	maintaining many of its important services, and falls within the protected scope of the Protective Order entered
11		in this action. See Dkt. 81 at 2-3. Public disclosure of such
11		confidential and proprietary information could affect
12		Google's competitive standing as competitors may alter
12		their systems and practices relating to competing
13		products. It may also place Google at an increased risk of
14		cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices
1.5		relating to competing products.
15	Expert Report of Jonathan E.	The information requested to be sealed contains Google's
16	Hochman	highly confidential and proprietary information regarding
17	Pages 9, 36, 44-46, 51-56, 59, 61,	highly sensitive features of Google's internal systems and
17	63-71, 73-76, 82, 86-91, 93-96, 98-	operations, including various types of Google's internal
18	108, 110-112, 115-126, 128-132,	projects, identifiers, data signals, and logs, and their
19	134, 136-137, 139, 142, 145, 150,   152-154	proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of
19	132-13 <del>1</del> 	its business and is not generally known to the public or
20	Google joins Plaintiffs' motion to	Google's competitors. Such confidential and proprietary
21	seal in part with respect to this document.	information reveals Google's internal strategies, system
21	document.	designs, and business practices for operating and
22		maintaining many of its important services, and falls
22		within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such
23		confidential and proprietary information could affect
24		Google's competitive standing as competitors may alter
25		their systems and practices relating to competing
25		products. It may also place Google at an increased risk of
26		cybersecurity threats, as third parties may seek to use the
		information to compromise Google's internal practices
27	Hochman Appendix A	relating to competing products.  The information requested to be sealed contains Google's
28	Trochinan Appendix A	highly confidential and proprietary information regarding
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1	Pages 3-4, 15, 19	highly sensitive features of Google's internal systems and
2	Google joins Plaintiffs' motion to seal in part with respect to this	operations, including various types of Google's internal projects and their proprietary functions, as well as
3	document.	metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known
4		to the public or Google's competitors. Such confidential
5		and proprietary information reveals Google's internal strategies, system designs, and business practices for
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7		Order entered in this action. See Dkt. 81 at 2-3. Public
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8		as competitors may alter their systems and practices
9		relating to competing products. It may also place Google
10		at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise
11		Google's internal practices relating to competing products.
12	Hochman Appendix D	The information requested to be sealed contains Google's
13	Pages 1-5	highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and
14	Google joins Plaintiffs' motion to	operations, including various types of Google's internal projects and identifiers, that Google maintains as
15	seal in part with respect to this document.	confidential in the ordinary course of its business and is
16		not generally known to the public or Google's competitors. Such confidential and proprietary
17		information reveals Google's internal strategies, system designs, and business practices for operating and
18		maintaining many of its important services, and falls
19		within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such
20		confidential and proprietary information could affect Google's competitive standing as competitors may alter
21		their systems and practices relating to competing
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22		information to compromise Google's internal practices
23	Hochman Appendix E	relating to competing products.  The information requested to be sealed contains Google's
24	Entirety	highly confidential and proprietary information regarding
25		highly sensitive features of Google's internal systems and operations, including various types of Google's internal
26	Google joins Plaintiffs' motion to seal in whole with respect to this	projects, identifiers, data signals, and logs, and their
27	document.	proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is
28		not generally known to the public or Google's
40		competitors. Such confidential and proprietary

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		their systems and practices relating to competing
2		products. It may also place Google at an increased risk of
3		cybersecurity threats, as third parties may seek to use the
		information to compromise Google's internal practices relating to competing products.
4	Hochman Appendix H	The information requested to be sealed contains Google's
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	Pages 1-30	highly sensitive features of Google's internal systems and
6	Google joins Plaintiffs' motion to	operations, including various types of Google's internal
7	seal in part with respect to this	projects, identifiers, data signals, and logs, and their
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16		relating to competing products.
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18	Entirety	highly sensitive features of Google's internal systems and
	Google joins Plaintiffs' motion to	operations, including various types of Google's internal projects, identifiers, data signals, and logs, and their
19	seal in whole with respect to this	proprietary functionalities, as well as internal metrics, that
20	document.	Google maintains as confidential in the ordinary course of
21		its business and is not generally known to the public or
21		Google's competitors. Such confidential and proprietary
22		information reveals Google's internal strategies, system designs, and business practices for operating and
23		maintaining many of its important services, and falls
24		within the protected scope of the Protective Order entered
		in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect
25		Google's competitive standing as competitors may alter
26		their systems and practices relating to competing
		products. It may also place Google at an increased risk of
27		cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices
28		relating to competing products.

1	Hochman Exhibit C	The information requested to be sealed contains Google's
2	   Entirety	highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and
3		operations, including various types of Google's internal
3	Google joins Plaintiffs' motion to seal in whole with respect to this	data signals, and logs, that Google maintains as
4	document.	confidential in the ordinary course of its business and is not generally known to the public or Google's
5		competitors. Such confidential and proprietary
6		information reveals Google's internal strategies, system
7		designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered
8		in this action. See Dkt. 81 at 2-3. Public disclosure of such
9		confidential and proprietary information could affect Google's competitive standing as competitors may alter
10		their systems and practices relating to competing products. It may also place Google at an increased risk of
11		cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices
12	T. 1 D.1311.D.	relating to competing products.
13	Hochman Exhibit E	The information requested to be sealed contains Google's highly confidential and proprietary information regarding
14	Entirety	highly sensitive features of Google's internal systems and
	Google joins Plaintiffs' motion to	operations, including various types of Google's internal data signals, and logs, and their proprietary
15	seal in whole with respect to this document.	functionalities, as well as internal metrics, that Google
16		maintains as confidential in the ordinary course of its
17		business and is not generally known to the public or Google's competitors. Such confidential and proprietary
18		information reveals Google's internal strategies, system
19		designs, and business practices for operating and maintaining many of its important services, and falls
		within the protected scope of the Protective Order entered
20		in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect
21		Google's competitive standing as competitors may alter
22		their systems and practices relating to competing products. It may also place Google at an increased risk of
23		cybersecurity threats, as third parties may seek to use the
24		information to compromise Google's internal practices relating to competing products.
	Hochman Rebuttal to Report of	The information requested to be sealed contains Google's
25	Georgios Zervas and Supplemental Report of Jonathan E. Hochman	highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and
26	Pages 8-18, 20-23, 26, 28, 30-31,	operations, including various types of Google's internal
27	33, 35-37, 40, 42-44, 48-50, 66-67. 69, 71-74	projects, identifiers, data signals, and logs, and their proprietary functionalities, as well as internal metrics, that
28		Google maintains as confidential in the ordinary course of

1	Google joins Plaintiffs' motion to seal in part with respect to this	its business and is not generally known to the public or
2	document.	Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system
3		designs, and business practices for operating and maintaining many of its important services, and falls
4		within the protected scope of the Protective Order entered
5		in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect
6		Google's competitive standing as competitors may alter
7		their systems and practices relating to competing products. It may also place Google at an increased risk of
		cybersecurity threats, as third parties may seek to use the
8		information to compromise Google's internal practices relating to competing products.
9	Hochman Rebuttal Appendix A	The information requested to be sealed contains Google's
10	Entirety	highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and
11	Google joins Plaintiffs' motion to	operations, including various types of Google's internal data signals, and logs, and their proprietary
12	seal in whole with respect to this document.	functionalities, as well as internal metrics, that Google
13		maintains as confidential in the ordinary course of its business and is not generally known to the public or
14		Google's competitors. Such confidential and proprietary
15		information reveals Google's internal strategies, system designs, and business practices for operating and
16		maintaining many of its important services, and falls within the protected scope of the Protective Order entered
17		in this action. See Dkt. 81 at 2-3. Public disclosure of such
		confidential and proprietary information could affect Google's competitive standing as competitors may alter
18		their systems and practices relating to competing
19		products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the
20		information to compromise Google's internal practices relating to competing products.
21	Hochman Rebuttal Appendix B	The information requested to be sealed contains Google's
22	Entirety	highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and
23	Google joins Plaintiffs' motion to	operations, including various types of Google's internal
24	seal in whole with respect to this document.	data signals, and logs, and their proprietary functionalities, as well as internal metrics, that Google
25		maintains as confidential in the ordinary course of its business and is not generally known to the public or
26		Google's competitors. Such confidential and proprietary
27		information reveals Google's internal strategies, system designs, and business practices for operating and
28		maintaining many of its important services, and falls within the protected scope of the Protective Order entered
-	L	William the protected scope of the Froteenive order effected

1		in this action. See Dkt. 81 at 2-3. Public disclosure of such
2		confidential and proprietary information could affect
2		Google's competitive standing as competitors may alter
3		their systems and practices relating to competing
		products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the
4		information to compromise Google's internal practices
5		relating to competing products.
	Hochman Rebuttal Appendix C	The information requested to be sealed contains Google's
6		highly confidential and proprietary information regarding
7	Entirety	highly sensitive features of Google's internal systems and
_	Google joins Plaintiffs' motion to	operations, including various types of Google's internal
8	seal in whole with respect to this	identifiers, data signals, and logs, and their proprietary
9	document.	functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its
		business and is not generally known to the public or
10		Google's competitors. Such confidential and proprietary
11		information reveals Google's internal strategies, system
		designs, and business practices for operating and
12		maintaining many of its important services, and falls
13		within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such
		confidential and proprietary information could affect
14		Google's competitive standing as competitors may alter
15		their systems and practices relating to competing
10		products. It may also place Google at an increased risk of
16		cybersecurity threats, as third parties may seek to use the
17		information to compromise Google's internal practices
	Hochman Rebuttal Appendix D	relating to competing products.  The information requested to be sealed contains Google's
18		highly confidential and proprietary information regarding
19	Entirety	highly sensitive features of Google's internal systems and
17	Coople ising Plaintiffe' motion to	operations, including various types of Google's internal
20	Google joins Plaintiffs' motion to seal in whole with respect to this	data signals, and logs, and their proprietary
21	document.	functionalities, as well as internal metrics, that Google
41		maintains as confidential in the ordinary course of its
22		business and is not generally known to the public or Google's competitors. Such confidential and proprietary
23		information reveals Google's internal strategies, system
23		designs, and business practices for operating and
24		maintaining many of its important services, and falls
25		within the protected scope of the Protective Order entered
۷3		in this action. See Dkt. 81 at 2-3. Public disclosure of such
26		confidential and proprietary information could affect
27		Google's competitive standing as competitors may alter their systems and practices relating to competing
27		products. It may also place Google at an increased risk of
28		cybersecurity threats, as third parties may seek to use the

1		information to compromise Google's internal practices
2		relating to competing products.
_	Hochman Rebuttal Appendix E	The information requested to be sealed contains Google's
3	Entirety	highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and
4	Google joins Plaintiffs' motion to	operations, including various types of Google's internal projects, identifiers, data signals, and logs, and their
5	seal in whole with respect to this document.	proprietary functionalities, as well as internal metrics, that
6	document.	Google maintains as confidential in the ordinary course of its business and is not generally known to the public or
7		Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system
8		designs, and business practices for operating and
9		maintaining many of its important services, and falls within the protected scope of the Protective Order entered
10		in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect
11		Google's competitive standing as competitors may alter
12		their systems and practices relating to competing products. It may also place Google at an increased risk of
13		cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices
		relating to competing products.
14	Hochman Rebuttal Appendix F	The information requested to be sealed contains Google's
15	Entirety	highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and
16	Google joins Plaintiffs' motion to	operations, including various types of Google's internal projects, identifiers, data signals, and logs, and their
17	seal in whole with respect to this document.	proprietary functionalities, as well as internal metrics, that
18		Google maintains as confidential in the ordinary course of its business and is not generally known to the public or
19		Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system
20		designs, and business practices for operating and
21		maintaining many of its important services, and falls within the protected scope of the Protective Order entered
22		in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect
23		Google's competitive standing as competitors may alter
24		their systems and practices relating to competing products. It may also place Google at an increased risk of
25		cybersecurity threats, as third parties may seek to use the
		information to compromise Google's internal practices relating to competing products.
26	Hochman Rebuttal Appendix G	The information requested to be sealed contains Google's
27	Entirety	highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and
28	Google joins Plaintiffs' motion to	operations, including various types of Google's internal

1 2	seal in whole with respect to this document.	projects, identifiers, data signals, and logs, and their proprietary functionalities, as well as internal metrics, that
		Google maintains as confidential in the ordinary course of its business and is not generally known to the public or
3		Google's competitors. Such confidential and proprietary
4		information reveals Google's internal strategies, system designs, and business practices for operating and
5		maintaining many of its important services, and falls within the protected scope of the Protective Order entered
6		in this action. See Dkt. 81 at 2-3. Public disclosure of such
7		confidential and proprietary information could affect Google's competitive standing as competitors may alter
8		their systems and practices relating to competing
9		products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the
10		information to compromise Google's internal practices relating to competing products.
11	Hochman Rebuttal Appendix H	The information requested to be sealed contains Google's
12	Entirety	highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and
13	Google joins Plaintiffs' motion to seal in whole with respect to this	operations, including various types of Google's internal projects, identifiers, data signals, and logs, and their
14	document.	proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of
15		its business and is not generally known to the public or Google's competitors. Such confidential and proprietary
16		information reveals Google's internal strategies, system
17		designs, and business practices for operating and maintaining many of its important services, and falls
18		within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such
19		confidential and proprietary information could affect Google's competitive standing as competitors may alter
20		their systems and practices relating to competing products. It may also place Google at an increased risk of
21		cybersecurity threats, as third parties may seek to use the
22		information to compromise Google's internal practices relating to competing products.
23	Hochman Rebuttal Appendix I	The information requested to be sealed contains Google's
24	Entirety	highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and
25	Google joins Plaintiffs' motion to	operations, including various types of Google's internal projects, identifiers, data signals, and logs, and their
26	seal in whole with respect to this document.	proprietary functionalities, as well as internal metrics, that
27		Google maintains as confidential in the ordinary course of its business and is not generally known to the public or
28		Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system

1		designs, and business practices for operating and
2		maintaining many of its important services, and falls within the protected scope of the Protective Order entered
3		in this action. See Dkt. 81 at 2-3. Public disclosure of such
		confidential and proprietary information could affect
4		Google's competitive standing as competitors may alter their systems and practices relating to competing
5		products. It may also place Google at an increased risk of
6		cybersecurity threats, as third parties may seek to use the
		information to compromise Google's internal practices relating to competing products.
7	Hochman Rebuttal Appendix J	The information requested to be sealed contains Google's
8	   Entirety	highly confidential and proprietary information regarding
9		highly sensitive features of Google's internal systems and operations, including various types of Google's internal
10	Google joins Plaintiffs' motion to seal in whole with respect to this	identifiers, data signals, and logs, and their proprietary
11	document.	functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its
12		business and is not generally known to the public or Google's competitors. Such confidential and proprietary
13		information reveals Google's internal strategies, system
		designs, and business practices for operating and maintaining many of its important services, and falls
14		within the protected scope of the Protective Order entered
15		in this action. See Dkt. 81 at 2-3. Public disclosure of such
16		confidential and proprietary information could affect Google's competitive standing as competitors may alter
		their systems and practices relating to competing
17		products. It may also place Google at an increased risk of
18		cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices
19		relating to competing products.
20	Hochman Rebuttal Appendix K	The information requested to be sealed contains Google's
20	Entirety	highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and
21	Google joins Plaintiffs' motion to	operations, including various types of Google's internal
22	seal in whole with respect to this	projects, identifiers, data signals, and logs, and their
23	document.	proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of
		its business and is not generally known to the public or
24		Google's competitors. Such confidential and proprietary
25		information reveals Google's internal strategies, system designs, and business practices for operating and
26		maintaining many of its important services, and falls
		within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such
27		confidential and proprietary information could affect
28		Google's competitive standing as competitors may alter

1		their systems and practices relating to competing
2		products. It may also place Google at an increased risk of
		cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices
3		relating to competing products.
4	Expert Report of Mark Keegan:	The information requested to be sealed contains Google's
5	Rebuttal of Expert Report of Professor On Amir and Appendices	highly confidential and proprietary information regarding
3		highly sensitive features of Google's internal systems and operations, including various types of Google's internal
6	Pages 59, 61	metrics, that Google maintains as confidential in the
7	Google joins Plaintiffs' motion to	ordinary course of its business and is not generally known
	seal in part with respect to this document.	to the public or Google's competitors. Such confidential
8	document.	and proprietary information reveals Google's internal strategies, system designs, and business practices for
9		operating and maintaining many of its important services,
10		and falls within the protected scope of the Protective
		Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary
11		information could affect Google's competitive standing
12		as competitors may alter their systems and practices
13		relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third
		parties may seek to use the information to compromise
14		Google's internal practices relating to competing
15	V F 111:0	products.
16	Keegan Exhibit 8	The information requested to be sealed contains Google's highly confidential and proprietary information regarding
	Pages Keegan_Exhibits_81, 83-87	highly sensitive features of Google's internal systems and
17	Google joins Plaintiffs' motion to	operations, including various types of Google's internal
18	seal in part with respect to this	projects, identifiers, and their proprietary functionalities, as well as internal metrics, that Google maintains as
19	document.	confidential in the ordinary course of its business and is
		not generally known to the public or Google's
20		competitors. Such confidential and proprietary
21		information reveals Google's internal strategies, system designs, and business practices for operating and
22		maintaining many of its important services, and falls
		within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such
23		confidential and proprietary information could affect
24		Google's competitive standing as competitors may alter
25		their systems and practices relating to competing
		products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the
26		information to compromise Google's internal practices
27	E de Contrata de C	relating to competing products.
28	Expert Report of Michael J. Lasinski	The information requested to be sealed contains Google's highly confidential and proprietary information regarding
_		inging confidential and proprietary information regarding

1	Pages: TOC, 1-2, 7, 9-16, 18-59, 65-67, 73-78, 80-82	highly sensitive features of Google's internal systems and operations, including various types of Google's internal
2	PDF Pages (Schedules): 107-178,	projects, identifiers, and their proprietary functionalities,
3	180-184, 186-188, 190, 192, 196, 199-203, 205-214, 216-230, 232,	as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is
4	235-239, 241-297	not generally known to the public or Google's competitors. Such confidential and proprietary
5	Google joins Plaintiffs' motion to seal in part with respect to this	information reveals Google's internal strategies, system designs, and business practices for operating and
6	document.	maintaining many of its important services, and falls
7		within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such
8		confidential and proprietary information could affect
9		Google's competitive standing as competitors may alter their systems and practices relating to competing
10		products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the
11		information to compromise Google's internal practices relating to competing products.
12	Expert Report of Bruce Schneier	The information requested to be sealed contains Google's
13	Pages 25, 57-59, 73-75, 80, 83, 87,	highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and
14	89-91, 93, 96-97	operations, including various types of Google's internal
15	Google joins Plaintiffs' motion to seal in part with respect to this	projects, identifiers, and their proprietary functionalities, as well as internal metrics, that Google maintains as
16	document.	confidential in the ordinary course of its business and is not generally known to the public or Google's
17		competitors. Such confidential and proprietary
18		information reveals Google's internal strategies, system designs, and business practices for operating and
19		maintaining many of its important services, and falls within the protected scope of the Protective Order entered
20		in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect
21		Google's competitive standing as competitors may alter
		their systems and practices relating to competing products. It may also place Google at an increased risk of
22		cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices
23		relating to competing products.
24	Expert Rebuttal Report of Bruce Schneier: Rebuttal of Expert	The information requested to be sealed contains Google's highly confidential and proprietary information regarding
25	Georgios Zervas	highly sensitive features of Google's internal systems and operations, including various types of Google's internal
26	Pages 11-14, 21-25	projects, identifiers, and their proprietary functionalities,
27 28	Google joins Plaintiffs' motion to seal in part with respect to this document.	as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's
		B or Soogie b

1 2	competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and
3	maintaining many of its important services, and falls within the protected scope of the Protective Order entered
4	in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect
5	Google's competitive standing as competitors may alter their systems and practices relating to competing
6	products. It may also place Google at an increased risk of
7 8	cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
9	
10	Google's request is narrowly tailored in order to protect its confidential information. These
11	redactions are limited in scope and volume. Because the proposed redactions are narrowly tailored
12	and limited to portions containing Google's highly-confidential or confidential information, Google
13	requests that the portions of the aforementioned documents be redacted from any public version of
14	those documents.
15	
16	I declare under penalty of perjury of the laws of the United States that the foregoing is true
17	and correct. Executed in San Francisco, California on July 27, 2022.
18	
19	DATED: July 27, 2022 QUINN EMANUEL URQUHART & SULLIVAN, LLP
20	SULLIVAN, LLF
21	
22	By /s/ Jonathan Tse Jonathan Tse
23	
24	Attorney for Defendant
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27	
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